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Littler Mendelson, P.C.  
900 Third Avenue  
New York, NY 10022.3298

Shawn Matthew Clark  
212.497.6840 direct  
212.583.9600 main  
smclark@littler.com

March 16, 2021

**VIA ECF AND FACSIMILE (914-390-4179)**

Hon. Nelson S. Roman  
United States District Judge  
United States District Court  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601-4150

Defendant's request to which Plaintiff consents is granted as follows: Defendant shall serve (not file) its motion for summary judgment on April 16, 2021; Plaintiff shall serve (not file) its opposition on May 17, 2021; Defendant shall serve its reply on June 1, 2021. All motion papers shall be filed on the reply date, June 1, 2021. The parties shall mail two hard copies of each of the motion papers to Chambers as they are served on the adversary. The Clerk of Court is directed to terminate the motion at ECF No. 21.

Re: *Kemp v. Regeneron Pharmaceuticals, Inc.*  
Case No. 20-cv-02270 (NSR) (JCM)

Dated: March 16, 2021  
White Plains, NY

**SO ORDERED:**

HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE

Dear Judge Roman:

As counsel for Defendant Regeneron Pharmaceuticals, Inc., we write, in accordance with Rule 1.E of Your Honor's Individual Practices in Civil Cases, to request an extension of Defendant's time to file its motion for summary judgment from March 19, 2021 to April 16, 2021. Defendant makes this request to give undersigned counsel, who will be drafting the summary judgment motion, additional time to complete a review of the factual record and finalize the motion. All but one of the depositions were taken, and a substantial portion of the document production was made while the undersigned was out on parental leave.

This is Defendant's first request for an extension of its time to file a summary judgment motion. Earlier today, counsel for the parties conferred via email, and Plaintiff consented to Defendant's request. The parties agreed on the following revised briefing schedule:

April 16, 2021:	Defendant's deadline to serve (not file) its motion for summary judgment;
May 17, 2021:	Plaintiff's deadline to serve (not file) her opposition to Defendant's summary judgment motion; and
June 1, 2021:	Defendant's deadline to serve its reply and all parties' deadline to file all motion documents.

In accordance with Your Honor's Individual Practices we enclose a Proposed Revised Briefing Schedule with Respect to Defendant's Motion for Summary Judgment. We thank the Court for its consideration of this request and the attached proposed order.

Respectfully submitted,

/s/ Shawn Matthew Clark

Enclosure

cc: All counsel of record (via ECF)

MEMO ENDORSED